

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA

In re:	*	CHAPTER 13
	*	
LESLIE McDANIEL,	*	CASE NO. 12-41231-JTL
	*	
Debtor,	*	JUDGE LANEY

LESLIE McDANIEL, Individually and as	*	
Representative of her Bankruptcy Estate,	*	
	*	
Plaintiff,	*	ADVERSARY PROCEEDING
	*	
vs.	*	NO. 13-04013
	*	
SUNTRUST BANK, SUNTRUST	*	
MORTGAGE, INC., McCALLA	*	
RAYMER, LLC, FOXFIRE ACRES, INC.,	*	
THE UNITED STATES by and through the	*	
THE INTERNAL REVENUE SERVICE,	*	
THE STATE OF GEORGIA (Represented	*	
by the DEPARTMENT OF REVENUE), THE	*	
GROGAN GROUP, LLC d/b/a GROGAN &	*	
GROGAN, and THE COLUMBUS	*	
CONSOLIDATED GOVERNMENT,	*	
	*	
Defendants.	*	

**PLAINTIFF’S RESPONSE TO MOTION TO DISMISS OR, ALTERNATIVELY,
MOTION FOR MORE DEFINITIVE STATEMENT**

Comes now, **Leslie McDaniel**, (herein “Plaintiff”), and makes this Response to the Motion to Dismiss, or Alternatively, Motion for More Definitive Statement (herein “Motion”), filed by McCalla Raymer, LLC, (herein “McCalla Raymer”), and says the following.

The Plaintiff prays that the Motion be denied, and that if not denied that the Plaintiff be authorized to amend pleadings to conform with the holdings of the Court with the Motion.¹

Plaintiff relies on the pleading filed herein and the pleadings proposed to be filed if the Court allows them.

Respectfully submitted.

/s/ Fife M. Whiteside

Fife M. Whiteside,
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¹A Motion for Leave to Amend is simultaneously filed.